



Shell Chemicals

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The Honorable Governor Christine Todd Whitman
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U.S. Environmental Protection Agency
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Express Mail

June 25, 2001

Dear Governor Whitman:

Keeping with Shell Chemical Company's commitment to Product Stewardship and Responsible Care®, we are pleased to announce that we are volunteering for Tier 1 of the Volunteer Children's Chemical Evaluation Program (VCCEP) announced in the December 26, 2000 Federal Register (65FR 81699). The following table provides information regarding the chemicals we will sponsor:

| CHEMICAL | CAS RN | ACC CONSORTIA |
|---------------------|-----------|---------------------------------|
| benzene | 71-43-2 | Benzene VCCEP Team |
| toluene | 108-88-3 | Toluene/Xylene VCCEP Consortium |
| o-xylene* | 95-47-5 | Toluene/Xylene VCCEP Consortium |
| m-xylene* | 108-38-5 | Toluene/Xylene VCCEP Consortium |
| acetone | 67-64-1 | VCCEP Acetone Task Group |
| methyl ethyl ketone | 78-93-3 | Ketones Panel |
| undecane | 1120-21-4 | n-Alkane VCCEP Consortium |
| n-dodecane | 112-40-3 | n-Alkane VCCEP Consortium |

*Shell Chemical Company does not manufacture the individual isomers of xylene but does manufacture mixed isomers xylene (1330-20-7) and thus believes it is important to participate in the program.

Each of the consortia listed above has provided separate letters of commitment listing the participants and other details relating to the VCCEP.

Contain NO CBI

At on time, Shell Chemical Company was an importer of ethylbenzene (100-41-4) in 1997. This was reflected in our 1998 Inventory Update Rule (IUR) report. While we no longer import ethylbenzene, Shell Chemicals Ltd's European operating company is currently a manufacturer. They actively participate in a CEFIC Sector Group on ethylbenzene. The CEFIC group is engaged in ongoing discussions with the ACC Ethylbenzene Panel with regards to the VCCEP. We are hopeful that the discussions will produce useful forum to support Shell's participation in the VCCEP for ethylbenzene.

For technical questions please contact:

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sincerely,

~~Jerry~~ Golden, President

Shell Chemical Company

cc: U.S. Environmental Protection Agency

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